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15 Attorneys for Defendants
UBER TECHNOLOGIES, INC.
16 and OTTOMOTTO LLC

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION

20 WAYMO LLC,
21 Plaintiff,
22 v.
23 UBER TECHNOLOGIES, INC.,
24 OTTOMOTTO LLC; OTTO TRUCKING LLC,
25 Defendants.

Case No. 3:17-cv-00939-WHA

**DECLARATION OF MICHELLE
YANG IN SUPPORT OF PLAINTIFF
WAYMO LLC'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL ITS
SUPPLEMENTAL MOTION FOR
CONTINUANCE AND RESPONSE TO
REQUEST FOR INPUT ON PENDING
MOTION TO CONTINUE TRIAL
DATE (DKT. 1928)**

1 I, Michelle Yang, declare as follows:

2 1. I am an attorney at the law firm of Morrison & Foerster LLP. I make this
3 declaration based upon matters within my own personal knowledge and if called as a witness, I
4 could and would competently testify to the matters set forth herein. I make this declaration in
5 support of Plaintiff Waymo LLC's Administrative Motion to File Under Seal Its Supplemental
6 Motion for Continuance and Response to Request for Input on Pending Motion to Continue Trial
7 Date (Dkt. 1928).

8 2. I have reviewed the following documents and confirmed that only the portions
9 identified below merit sealing:

Document	Portions to Be Filed Under Seal
Waymo's Supplemental Motion for Continuance ("Supplemental Motion")	Red Boxes
Exhibit 3	Entire Document
Exhibit 7	Red Boxes
Exhibit 19	Red Boxes
Exhibit 22	Red Boxes

18 3. The red boxes in the Supplemental Motion contain highly confidential information
19 regarding design options and technical features of Uber's self-driving car technology. The red
20 boxes in Exhibit 19 contain highly confidential information regarding technical features of Uber's
21 self-driving car technology. This information is not publicly known, and its confidentiality is
22 strictly maintained. I understand that disclosure of this information could allow competitors and
23 counterparties to gain insight into the development plans and progress of Uber's self-driving car
24 program. Disclosure of this information could significantly harm Uber's competitive standing.

25 4. The entirety of Exhibit 3 is an internal presentation containing highly confidential
26 information regarding design options for Uber's LiDAR technology. This confidential
27 information is not publicly known, and its confidentiality is strictly maintained. I understand that
28

1 disclosure of this information could allow competitors to obtain a competitive advantage over
2 Uber by gaining insight into design options for LiDAR development, such that they could tailor
3 their own LiDAR development. Uber's competitive standing could be significantly harmed.

4 5. The red boxes in Exhibit 7 contain the personal residential address and personal
5 email addresses of an individual involved in this media-intensive case. Waymo did not serve this
6 individual with this particular document, so Defendants propose those redactions of personal
7 contact information as a courtesy.

8 6. Portions of Exhibit 22 marked in red boxes contain email addresses of current and
9 former employees, whose personal contact information may be targeted if disclosed to the public.
10 Defendants seek to seal this information in order to protect the privacy of these individuals
11 because this lawsuit is currently the subject of extensive media coverage. Disclosure of this
12 information could expose these individuals to harm or harassment. Exhibit 22 was not originally
13 included in Waymo's administrative motion to file under seal, but Defendants have requested that
14 Waymo remove access to Exhibit 22 and file a version that redacts this contact information.

15 7. Defendants' request to seal is narrowly tailored to the portions of Waymo's
16 Motion and its supporting papers that merit sealing.

17 I declare under penalty of perjury that the foregoing is true and correct. Executed this 6th
18 day of October, 2017 in San Francisco, California.

19
20 /s/ Michelle Yang

Michelle Yang

ATTESTATION OF E-FILED SIGNATURE

I, Arturo J. Gonzalez, am the ECF User whose ID and password are being used to file this Declaration. In compliance with General Order 45, X.B., I hereby attest that Michelle Yang has concurred in this filing.

Dated: October 6, 2017

/s/ Arturo J. Gonzalez

ARTURO J. GONZALEZ